

REMARKS

New claims 21-22 have been added. Thus, claims 1-22 are now pending.

Section 112 Rejection

Claims 8-11 and 19-20 stand rejected under Section 112, second paragraph. These rejections are respectfully traversed. The instant specification explains in paragraph [0049] that a bush test involved using a dry brush for an abrasion test where the dry brush is used to rub the coated sheet in order to simulate a situation where water was unexpectedly cut off in a coated sheet washer. Moreover, the specification explains in paragraph [0049] that a glove mar test is an abrasion test using a rubbing material similar to that commonly used in gloves of glass handlers. These tests are thus defined in the specification. The use of “brush test” and “glove mar test” in these claims is clear and definite. Moreover, the brush used is compliant with DIN 53 778, emphasizing that it is known to those skilled in the art. Since no art rejection has been made with respect to claims 8-11 and 19-20, these claims are in condition for allowance.

Claim 1

Claim 1 stands rejected under Section 103(a) as being allegedly unpatentable over Stachowiak (US 6,602,608) in view of both Medwick (US 6,682,773) and Konda (US 5,254,201). This 3-way Section 103(a) rejection is respectfully traversed for at least the following reasons.

The Office Action contends that it would have been obvious to have modified Stachowiak by provide a protective coating thereon as taught by Medwick. However, even if Stachowiak is modified by applying to it the protective coating of Medwick (which applicant does not agree with), the resulting modified product still would not meet the invention of claim 1. In particular, the resulting product still would not have a protective coating applied “in non-

liquid form” and which is removed by “peeling” as required by claim 1. Instead, as explained in paragraph [0014] of the instant specification, Medwick’s coating is a reaction product applied in liquid form. Moreover, Medwick’s reaction product coating cannot be removed by peeling, and requires much more complicated and undesirable steps. *Thus, even the proposed modification to Stachowiak in view of Medwick would not meet the invention of claim 1 for at least these several reasons.*

The Office Action then contends that it would have been obvious to have used the solid film of Konda in Stachowiak/Medwick. This contention is incorrect and is respectfully traversed. Konda discloses a conductive wafer-protective sheet that is used to protect semiconductor wafers from static electricity. In this regard, Konda requires that the protective sheet is electrically *conductive*, so that it can protect the *semiconductor wafer from static electricity* (e.g., col. 2, lines 55-58; col. 4, lines 6-15). In contrast, there is no static electricity problem in Stachowiak/Medwick. Moreover, there is no semiconductor wafer to protect in Stachowiak/Medwick. Because Stachowiak has no semiconductor wafer to protect, and there is no problem with static electricity in Stachowiak, there is no reason why one of ordinary skill in the art would have ever used Konda’s conductive wafer-protective sheet in the device of Stachowiak. Additionally, there is no reason why one of ordinary skill would ever want a conductive protective sheet to be present in Stachowiak/Medwick, given that this could be damaging and destroy the product during glass processing such as cutting and scoring. One of ordinary skill would have used a conductive coating in a coated glass application. Thus, it will be appreciated that there is no suggestion or motivation in the cited art for the alleged modification of Stachowiak based on Konda.

The above 3-way Section 103(a) is incorrect for the reasons discussed above. This rejection should be withdrawn as to pending claims 1-7 and 12-18.

Claim 21 requires that the step of adhering the flexible protective sheet in non-liquid form to the top surface of the low-E coating comprises applying the flexible protective coating to the surface when the surface is at a temperature of from about 60-120 degrees C. For example support, see [0038] of the instant specification as originally filed. The cited art fails to disclose or suggest this subject matter.

Claim 22 requires that the step of adhering the flexible protective sheet in non-liquid form to the top surface of the low-E coating comprises applying the flexible protective coating to the surface when the surface is at a temperature of from about 90-120 degrees C. For example support, see [0038] of the instant specification as originally filed. The cited art fails to disclose or suggest this subject matter.

It is respectfully requested that all rejections be withdrawn. All claims are in condition for allowance.

Respectfully submitted,

NIXON & VANDERHYE P.C.

By: 

Joseph A. Rhoa
Reg. No. 37,515

JAR:caj
901 North Glebe Road, 11th Floor
Arlington, VA 22203-1808
Telephone: (703) 816-4000
Facsimile: (703) 816-4100